REMARKS

Claims 9-14 are pending in the present application. Favorable reconsideration of the application and prompt allowance of the claims in view of the reasons set forth herein are respectfully requested.

The rejection of claims 9-14 under 35 U.S.C. §103(a) over Honjo (U.S. Patent No. 6,006,007) in view of Fujinami et al. (U.S. Patent No. 5,455,684, hereinafter "Fujinami") is respectfully traversed.

Honjo is directed to an optical disk apparatus for recording and reproducing compression encoded video signals. According to Honjo, during optical disk recording of a digital coded video signal, the number of infield or inframe encoded data frames or their address information are stored on an innermost or outermost region of an optical disk. During playback these frames are first retrieved for uses as control data. Since the numbers or address information of the infield or inframe encoded data frames are acquired, a specific playback mode, e.g., high-speed playback or still picture reproduction, can purportedly be readily executed with allegedly advantageous effects through searching the address information.

There is no teaching or suggestion in Honjo of controlling the head position of a data-pack including the head of coded data of a key frame as set forth in the claimed

invention. It is respectfully submitted that the claimed "head position of a data-pack..." is not the same as the address area of Honjo. Honjo merely describes control of a position of infield coded data or inframe coded data, i.e., *an address area*. On the other hand, and in complete distinction, the claimed invention is directed to control of the head position of a data-pack including the head of coded data of a key frame.

Fujinami is directed to a method and apparatus for processing a variable-rate coded signal for recording and to provide a high-speed search capability. Fujinami purports to solve the inefficiencies of prior art such as Honjo in which the position of an I-picture is not known, and the search process must wait for an access point to appear after the read position has been moved by some amount (i.e., the read head is positioned in an "address area"). Fujinami does this using a complex method of providing signal markers that are multiplexed with the coded data. The "entry point" of Fujinami makes use of signal markers that are multiplexed with the coded data. In order to multiplex the signal markers with the coded data, a large capacity memory device is required, e.g., DSM 10 in Figure 16.

It is respectfully submitted that Fujinami fails to overcome the fundamental deficiencies noted above with respect to Honjo. Therefore, even if, *arguendo*, the combination of Fujinami with Honjo were proper, the combination nevertheless fails to render the claimed invention obvious. For example, as set forth above, Honjo merely

describes the control of an address area and does not provide the specifically claimed head position of a data-pack (see, e.g., Col. 2, lines 38-58, and in particular, lines 44-48, describing accessing *address areas* that include intraframe data). Fujinami, recognizing the problems with systems relating to an address area, such as that of Honjo, provides a solution that requires *multiplexing* of signal markers with the coded data. As noted previously, the claimed invention specifically requires that the control data be recorded separately from the multiplexed coded data.

At the outset, it is noted that the proposed combination of Fujinami and Honjo would destroy one of the objects of Honjo, namely, storing the address information in an innermost or outermost region of the optical disk. Instead, Fujinami teaches the opposite, i.e., multiplexing the signal markers with the coded data. Therefore, for at least this reason, not only is the proposed combination improper, it would not render the claimed invention obvious. Additionally, Fujinami recognizes and confirms the above-described drawbacks of systems that control an "address area" such as the system of Honjo. In particular, Fujinami discloses that a drawback associated with using an address area is that because the position of the I-picture is not known, the search process must wait for an access point to appear after the read position has been moved by some amount because the read head is positioned in an "address area." (see, e.g., Col. 8, lines 4-9 of Fujinami). This type of "approximate" positioning of the read head is entirely inapposite to the claimed invention and Fujinami.

Therefore, not only is the proposed combination of Fujinami and Honjo improper, the combination, even if improperly made, fails to render the claimed invention obvious. Accordingly, reconsideration and withdrawal of the rejection are respectfully requested.

The rejection of claims 9-14 under 35 U.S.C. §103(a) over Togo et al. (JP 40613326A, hereinafter "Togo") in view of Admitted Prior Art ("APA") Figures 1 and 2, is respectfully traversed.

Togo is directed to a moving picture compression data storage control method. Togo discloses that position information relating to an I-picture is multiplexed in an already compressed (i.e., coded) bit stream. This system is entirely inapposite to the claimed invention in that the position information is not multiplexed in the bit stream.

The APA relates to a device for high-speed reading of coded data from a disk and high-speed reproduction of the same data *without* using the control data specifically recited in the claimed invention.

Therefore, even if, *arguendo*, the combination of Togo with APA were proper, the combination nevertheless fails to render the claimed invention obvious. For example, the proposed combination would result in a system in which the position information is

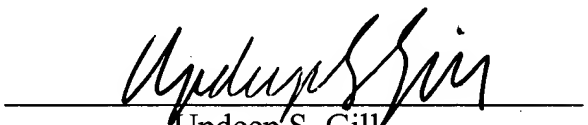
multiplexed with the coded data. Accordingly, reconsideration and withdrawal of the rejection are respectfully requested.

In view of the foregoing, it is respectfully submitted that the entire application is in condition for allowance. Favorable reconsideration of the application and prompt allowance of the claims are earnestly solicited.

Should the Examiner deem that further issues require resolution prior to allowance, the Examiner is invited to contact the undersigned attorney or record at the telephone number set forth below.

Respectfully submitted,

NIXON & VANDERHYE P.C.

By: 
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